



**Lewis
Baach
Kaufmann
Middlemiss**
PLLC

December 1, 2021

VIA ECF AND ELECTRONIC MAIL

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York

APPLICATION GRANTED
SO ORDERED


John G. Koeltl, U.S.D.J.

12/1/21

Re: *United States v. Sean Wygovsky*
21-cr-00718 (JGK)

Dear Judge Koeltl:

The defendant, Sean Wygovsky, by counsel, submits this letter, seeking approval of a modification in Mr. Wygovsky's bail conditions in that he be permitted to travel to and from the District of Columbia. We have discussed this matter with the Government, and they have no objection to this request.

Mr. Wygovsky now resides in Virginia, he has recently become aware of a job opportunity and would like to pursue it, but it is located in Washington, D.C. As a result, we are requesting that his bail conditions be modified to permit travel to the District of Columbia. Pretrial services is aware of the particulars of this job offer and consents to this modification in his bail conditions. Pretrial services suggested that Mr. Wygovsky's bail conditions be modified to permit "travel to the Washington, D.C. metropolitan area."

As a result, we respectfully request that this Court order that Mr. Wygovsky's bail be modified to permit travel to the Washington, D.C. metropolitan area.

Sincerely,

Anthony M. Capozzolo
(212) 897-1970